

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MELINDA LAMBERSON	:	CIVIL ACTION
REYNOLDS,	:	NO. 09-CV-1492
<i>Plaintiff</i>	:	
	:	(Judge Munley)
<i>v.</i>	:	
	:	Electronically Filed
COMMONWEALTH OF	:	
PENNSYLVANIA, <i>et al.</i> ,	:	
<i>Defendants</i>	:	

**UNOPPOSED MOTION OF BEVERLY LAMBERSON,
ADMINISTRATRIX OF THE ESTATE OF MELINDA LAMBERSON
REYNOLDS, PURSUANT TO RULE 25(a)(1), F.R.CIV.P.
TO BE SUBSTITUTED AS THE PLAINTIFF**

Beverly Lamberson, Administratrix of the Estate of Melinda Lamberson Reynolds, Deceased (the “Administratrix”), by her attorneys, moves this Honorable Court, pursuant to Rule 25(a)(1) of the Federal Rules of Civil Procedure, to be substituted as the plaintiff in this action. Defendants’ counsel have informed counsel for the Administratrix that they have no objection to this motion.

In support of this Motion, the Administratrix respectfully represents as follows:

1. Plaintiff Melinda Lamberson Reynolds (“Plaintiff Decedent”) died on February 18, 2012.

2. Letters of Administration on the Estate of Plaintiff Decedent were granted to the Administratrix by the Register of Wills of Monroe County, Pennsylvania on May 22, 2012.

3. A copy of the Short Certificate issued by the Register of Wills, reflecting the appointment of the Administratrix (with the Social Security Number of Plaintiff Decedent redacted) is attached hereto as Exhibit A for the information of the Court.

WHEREAS, the Administratrix respectfully requests that she be substituted as plaintiff in place of Plaintiff Decedent pursuant to Rule 25(a)(1) of the Federal Rules of Civil Procedure.

/s/ Lawrence D. Berger
Lawrence D. Berger
Shepherd, Finkelman, Miller & Shah,
LLP
35 East State Street
Media, PA 19063
(610) 891-9880 (phone)
(610) 891-9883 (fax)
lberger@sfmslaw.com (e-mail)
PA 16028

/s/ Michael Churchill
Michael Churchill
Public Interest Law Center of
Philadelphia
1709 Benjamin Franklin Parkway, 2d
Floor
Philadelphia, PA 19103
(215) 627-7100 (phone)
(215) 627-7183 (fax)
MChurchill@pilcop.org (e-mail)
PA 04661

Attorneys for Decedent Plaintiff Melinda Lamberson Reynolds and for Substituted Plaintiff Beverly Lamberson, Administratrix of the Estate of Melinda Lamberson Reynolds, Deceased

Certificate of Service

I hereby certify that the Unopposed Motion Of Beverly Lamberson, Administratrix Of The Estate Of Melinda Lamberson Reynolds, Pursuant To Rule 25(a)(1), F.R.Civ.P. To Be Substituted As The Plaintiff, and proposed Order, are being served on counsel of record through the Court's electronic docketing system (CM/ECF).

/s/ Lawrence D. Berger